

PROGRESS REPORT NO. 9

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(via Email)
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CC: David Godlewski – TCAI (via Email)
Bruce Duncan – EPA, Region 10 (via Email)
David Charters – EPA, Headquarters (via Email)

DATE: April 10, 2007

RE: Upper Columbia River (UCR) Remedial Investigation/Feasibility Study
(RI/FS) - Progress Report No. 9: Month Ending March 2007

Pursuant to Paragraph 39 of the June 2, 2006 Settlement Agreement (Agreement), the following is intended to provide a summary of the activities completed during the past month in compliance with the aforementioned Agreement. In addition, it is also intended to provide a summary of proposed activities to be carried out within the coming months.

Based on EPA's preliminary comments on the draft work plan and in preparation for the April 17-19, 2007 meeting(s) in Seattle, Washington, TCAI has developed and submitted to EPA and Participating Parties a "*Working Draft Annotated Outline for the Ecological Risk Assessment Screening-Level Problem Formulation*" which included revised Conceptual Site Models (CSMs) for the various reaches of the UCR. In addition, TCAI also developed and submitted to EPA and Participating Parties a working draft of decision frameworks that are intended to provide a 'roadmap' (i.e., logic framework) for the approach in completing studies listed within the Agreement and the draft work plan. It is anticipated that these decision frameworks will be used to facilitate the understanding of proposed studies and be beneficial during the upcoming April 2007 meeting(s).

In addition to the above-mentioned working drafts, TCAI has also submitted to EPA and Participating Parties a draft working schedule for the various phases of the RI/FS. Given that the UCR RI/FS is an iterative process, the schedule does not list specific dates on which activities (e.g., submission of respective sampling and analysis plans) will be completed. Rather, and as agreed to with EPA, the draft schedule has been developed based on the approval date of preceding steps/activities. For example, sampling and analysis plans (SAPs) and associated quality assurance project plans for Phase 2a activities will be submitted to EPA within 120 days of receiving approval on the work plan.

At the time of writing, it has not yet been discussed nor determined what deliverables TCAI and EPA may be required to generate as a result of the April 2007 meeting(s). However, it is anticipated that at a minimum, TCAI in conjunction with EPA will summarize and incorporate the technical ideas generated during the meeting(s) which will be submitted to Participating Parties for review. Upon receiving final comments on the December 2006 draft work plan and

concurrence and approval that the technical ideas presented during the April meeting(s) were accurately captured, it is anticipated that revisions to the draft work plan will be required. The exact scheduling of this activity is anticipated to be discussed with EPA following the April 2007 meeting(s).

A summary of activities (i.e., deliverables) completed to date, and those anticipated within in the near future, are presented within Table 1 below.

Table 1. Upper Columbia River Remedial Investigation/Feasibility Study Summary of On-Going and Planned Activities

Task No.	Task Description	Status	Issues	Estimated Completion Date ¹
1.	2005 Field Data Transfer	Complete	None to report at this time	<u>July 31, 2006</u>
2.	Technical Memorandum ² .	Complete	None to report at this time	<u>October 27, 2006</u>
3.	Draft RI/FS Work Plan	Complete	None to report at this time	<u>December 28, 2006</u>
4.	Sampling and Analysis Plan (SAP) ³ .	Complete	None to report at this time	<u>February 26, 2007</u>
5.	Health and Safety Plan	Complete	None to report at this time	<u>February 26, 2007</u>
6.	Cultural Resources Coordination Plan	Complete	None to report at this time	<u>February 26, 2007</u>
7.	Revised RMAO Memorandum ⁴ .	Complete	None to report at this time	<u>March 11, 2007</u>
8.	Surface Water SAP	Temporarily Delayed	Awaiting Outcome/Inputs of April 17-19 Meeting	TBD ⁵ .
9.	Additional Trail Data ⁶ .	On-going	None to report at this time	May 7, 2007
10.	Screening Level ERA ⁷ .	Temporarily Delayed	Awaiting Outcome/Inputs of April 17-19 Meeting	TBD

- Notes:
1. Dates that have been underlined represent the actual day that the respective deliverable was submitted to EPA as per Paragraph 80 of the Agreement.
 2. As outlined within the Agreement, the technical memorandum outlines and described the Risk-Based Remedial Objectives for the Ecological Risk Assessment. Remedial objectives for the protection of human health will be prepared by EPA and submitted under separate cover at a later date.
 3. The SAP submitted in fulfillment of Paragraph 13 of the Agreement was the *2007 Sediment Investigation of Beaches and Depositional Areas*.
 4. The draft technical memorandum on risk-based management action objectives (RMAOs) is to be revised per EPA's January 16, 2007 comments.
 5. TBD = To Be Determined. Activities to complete this task have been temporarily delayed pending feedback/inputs from the April 17-19, 2007 meeting with EPA and Participating Parties. Items of discussion during the aforementioned meeting will be beneficial in completing this task and will help to ensure that the document is completed in such a manner that incorporates items of discussions from the meeting, and facilitates review and approval of the document.
 6. Following a request outlined by EPA in a letter dated February 1, 2007 (received on February 5, 2007), TCAI is in the process of compiling additional information for the Trail Facility so as to assist in the identification of contaminants of potential concern (COPCs) as outlined within Paragraph 24 of the Agreement.
 7. ERA = Ecological Risk Assessment. It should be noted that this activity has been somewhat delayed until discussions with EPA and Participating Parties regarding the draft work plan and key items (e.g., problem formulation and site conceptual models) occur.

Should you have any questions or require any additional information, please do not hesitate to contact me at 509-892-2585.